

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America

ex rel. ALEX DOE, Relator,

CIVIL ACTION NO. 2:21-CV-00022-Z

The State of Texas

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ex rel. ALEX DOE, Relator,

Date: July 28, 2022

The State of Louisiana

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ex rel. ALEX DOE, Relator,

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Plaintiffs,

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V.

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Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., Planned
Parenthood of Greater Texas, Inc., Planned
Parenthood South Texas, Inc., Planned Parenthood
Cameron County, Inc., Planned Parenthood San
Antonio, Inc.,

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Defendants.

AFFILIATE DEFENDANTS' MOTION TO COMPEL TO RELATOR

Defendant Planned Parenthood Gulf Coast, Inc. (“PPGC”) respectfully moves the Court pursuant to Federal Rule of Civil Procedure (“FRCP”) 37 for an order compelling Relator’s production of complete written responses and responsive documents in response to PPGC’s

Interrogatories and Requests for Production (collectively, “Discovery Requests”).¹ In support of its Motion, PPGC respectfully refers the Court to its Brief in Support.

WHEREFORE, PPGC requests that this Court overrule Relator’s objections to PPGC’s Interrogatories and Requests for Production and order Relator to provide complete verified responses and produce all responsive documents. This Court should also order Relator to preserve and search Relator’s data consistent with generally accepted document collection methods and to produce a privilege log for any of his assertions of privileges.

Dated: July 28, 2022

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER
LLP

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¹ Defendants Planned Parenthood of Greater Texas, Inc. (“PPGT”), Planned Parenthood South Texas, Inc. (“PPST”), Planned Parenthood Cameron County, Inc. (“PP Cameron County”), and Planned Parenthood San Antonio, Inc. (“PP San Antonio”) consent to this motion.

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Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County,
and Planned Parenthood San Antonio*

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

/s/ Tirzah S. Lollar
Tirzah S. Lollar

CERTIFICATE OF CONFERENCE

On July 25, in accordance with Local Rule 7.1(b), counsel for Defendants certify that they conferred with counsel for Relator and counsel for Texas regarding the relief requested in this motion. Relator's counsel Andrew Stephens participated in the conference. Mr. Stephens stated that Relator is opposed.

/s/ Tirzah S. Lollar

Tirzah S. Lollar